

## REMARKS

This is a full and timely response to the outstanding final Office Action mailed December 9, 2004. Claims 1 - 21 remain pending. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

### Rejections Under 35 U.S.C. §103

The Office Action indicates that claims 1 – 21 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *McCarty* in view of *Pearson*, and further in view of *Hartsell*. Applicants respectfully traverse the rejection.

Turning first to *McCarty*, that reference generally discloses a system and method for automatically and dynamically changing an address associated with a device disposed in a fibre channel environment. As disclosed in *McCarty*:

It is known that the FC-AL standard allows each FC device to negotiate for an Arbitrated Loop Physical Address (AL.sub.-- PA). Moreover, while participating on an Arbitrated Loop, the FC devices must log in to each other before commencing a loop transaction. If a device is not logged in to another device, it will discard any frames it receives from that device until it is logged in. Since an initiator or driver must be able to manage the target device with which it is communicating, the initiator keeps track of an FC-specific identity triplet for that target device. This FC-specific ID triplet comprises a target's Node.sub.-- Name, its Port.sub.-- Name, and its AL.sub.-- PA. While the AL.sub.-- PA is dynamically assigned upon a loop reset, the Node.sub.-- Name and Port.sub.-- Name are formed from the device's unique World.sub.-- Wide.sub.-- Name.

When the devices come up onto an Arbitrated Loop upon a reset, they configure their AL.sub.-- PAs in one of three ways: via a Soft Address scheme, a Preferred Address scheme, or a Hard Address scheme. In a Soft Address scheme, the device does not care what AL.sub.-- PA it is assigned. Rather, it simply accepts the first free AL.sub.-- PA available.

In a Preferred Address scheme, the FC device would like to be assigned a particular AL.sub.-- PA. However, if a desired AL.sub.-- PA is unavailable for some reason, it will accept whichever AL.sub.-- PA that is free and available. *For example, after a device is assigned a specific AL.sub.-- PA for the first time upon "global" system initialization following the loading of the OS, that device will continue to request for that AL.sub.-- PA*

*upon subsequent loop resets. However, once this device goes off-line from the Arbitrated Loop, it will lose its ability to "prefer" that AL.sub.-- PA and must resort to accepting the first free AL.sub.-- PA that is available.*  
(*McCarty*, Col. 7, line 43 – Col. 8, line 6). (Emphasis Added).

As disclosed above, assignment of addresses in accordance with *McCarty* is an automatic process and does not involve interaction of an operator. This is in direct contrast to the features/limitations recited in Applicants' claims as will be described in detail below.

In this regard, it appears as though the Office Action is attempting to attribute significance to *McCarty*'s use of the term "initiator" as somehow referring to interaction with an operator. (See Office Action, page 3, line 19). Applicant respectfully notes that this attempted attribution is flawed because Applicant has used the term "operator" in accordance with its common and ordinary meaning, *i.e.*, a human technician, and *McCarty* defines the term in a manner inconsistent with the Office Action. Specifically, *McCarty* discloses that,

As is well-known in the art, *a SCSI device can be either an initiator or a target* and the SCSI bus 125 can include any combination thereof provided at least one initiator and one target are present. For example, the processor 110, through its adapter 115, may function as the initiator and the device 120D may function as a target in the channel communication system 100. Certain specific functions are assigned to either an initiator or a target: (i) an initiator can arbitrate for the bus 125 and select a target; (ii) a target can request the transfer of command, data, status, or other information to or from the initiator, and (iii) in some instances, a target can arbitrate for the bus 125 and reselect an initiator to continue a bus transaction.

(*McCarty*, col. 3, lines 3 - 15).

Therefore, Applicant respectfully asserts that any reliance of the Office Action's on *McCarty* for teaching or reasonably suggesting the interaction of an operator for rendering the present claims unpatentable is misplaced.

*Hartsell* does not remedy this apparent deficiency of *McCarty*. With respect to *Hartsell*, that reference generally relates to systems and methods for billing in information management environments and has a filing date subsequent to that of the present application. Therefore, Applicant respectfully asserts that the use of *Hartsell* as a reference in the pending

Office Action is improper. Thus, for this reason alone, Applicant respectfully asserts that the pending rejection should be removed. However, even if the use of *Hartsell* was proper, the teachings relied upon are much more limited in scope than presented in the Office Action. Specifically, the teachings in *Hartsell* used in the Office Action relate to the use of a GUI. Specifically, *Hartsell* discloses:

[0290] It will be understood that the forgoing examples of adherence monitoring are exemplary only, and that a variety of other parameters and combinations of parameters may be monitored or tracked in step 1250 of FIG. 8. Furthermore, it will be understood that monitored parameters may be displayed or otherwise communicated or recorded in any suitable manner. For example, current bandwidth consumption may be monitored in real time and presented, for example, via graphical user interface ("GUI"), data file, external report, or any other suitable means.

Clearly, *Hartsell* discloses the use of a GUI for various types of adherence monitoring, which has no similarity to changing address information utilized by a fibre channel controller, as is set forth in detail below. Thus, even though *Hartsell*'s GUI may present information to an operator, there is nothing in *Hartsell* indicating the interaction with an operator as specifically recited in the present claims. Notably, *Pearson* also is deficient in this regard.

Turning now to the pending claims, claim 1 recites:

1. A method for changing address information utilized by a fibre channel controller, the fibre channel controller being associated with a port of a network device, the method comprising:
  - facilitating utilization of current address settings of a fibre channel controller for the network device;
  - receiving, from an operator, information corresponding to desired address settings of the network device;*
  - storing the information corresponding to the desired address settings of the network device; and
  - replacing the current address settings with the stored, desired address settings of the network device.*(Emphasis Added).

Applicants respectfully assert that the cited art of record, either individually or in combination, is legally deficient for the purpose of rendering claim 1 unpatentable. In particular, Applicants respectfully assert that the cited art does not teach or reasonably suggest

at least the features/limitations emphasized above in claim 1. Therefore, Applicants respectfully assert that claim 1 is in condition for allowance.

Since claims 2 – 6 and 21 are dependent claims that incorporate all the features/limitations of claim 1, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

With respect to claim 7, that claim recites:

7. A method for changing address information utilized by a fibre channel controller, the method comprising:  
*enabling current address information corresponding to an address of the fibre channel controller to be provided to an operator;*  
enabling address setting information corresponding to address settings of the fibre channel controller to be provided to the operator;  
*enabling the operator to change the address settings of the fibre channel controller by providing information corresponding to the address settings to the fibre channel controller; and*  
*enabling the operator to change the current address of the fibre channel controller in response to the change of the address settings.*  
(Emphasis Added).

Applicants respectfully assert that the cited art of record, either individually or in combination, is legally deficient for the purpose of rendering claim 7 unpatentable. In particular, Applicants respectfully assert that the cited art does not teach or reasonably suggest at least the features/limitations emphasized above in claim 7. Therefore, Applicants respectfully assert that claim 7 is in condition for allowance.

Since claims 8 – 12 are dependent claims that incorporate all the features/limitations of claim 7, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

With respect to claim 13, that claim recites:

13. A system for changing address information utilized by a network device, said system comprising:

*a control system configured to receive information corresponding to desired address settings of the network device from an operator, store information corresponding to the desired address settings of the network device, and replace the current address settings with the desired address settings of the network device such that a communications port associated with the network device may be recognized by the network as being associated with the current address.*

(Emphasis Added).

Applicants respectfully assert that the cited art of record, either individually or in combination, is legally deficient for the purpose of rendering claim 13 unpatentable. In particular, Applicants respectfully assert that the cited art does not teach or reasonably suggest at least the features/limitations emphasized above in claim 13. Therefore, Applicants respectfully assert that claim 13 is in condition for allowance.

Since claims 14 – 20 are dependent claims that incorporate all the features/limitations of claim 13, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

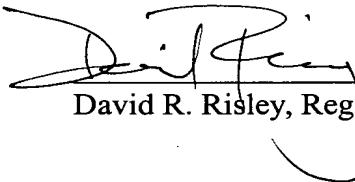
#### **Cited Art Made of Record**

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

## CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims 1 - 21 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on 11/25/05.

Stephanie Risley  
Signature